

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

LOUISE YARBRA,

Plaintiff,

V.

FEDEX CUSTOM CRITICAL, INC.,  
PROTECTIVE INSURANCE COMPANY  
And LAQUINTON BAUGH,

Defendants.

Civil Action File No.:

## NOTICE OF REMOVAL

**TO: PLAINTIFF'S COUNSEL**

Tyler H. Bridgers, Esq.  
The Simon Law Firm, P.C.  
2860 Piedmont Road N.E., Suite 210  
Atlanta, Georgia 30305

**PLEASE TAKE NOTICE** that Defendant LaQuinton Baugh, by and through his undersigned counsel of record, pursuant to U.S.C. §§ 1441 and 1332, and files this Notice of Removal of this action from the State Court for the County of Henry, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

In support of this Notice of Removal, the Defendant has filed

contemporaneously herewith their Brief in Support of Removal and accompanying Exhibits, including the pleadings and entire record of this matter.

WHEREFORE, Defendant LaQuinton Baugh respectfully requests that this Court enter an Order removing this action from the State Court for the County of Henry, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

Respectfully submitted this the 21<sup>st</sup> day of March, 2019.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

KEVIN T. SHIRES

State Bar No.: 643290

284 N. Main Street  
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**CERTIFICATE OF COMPLIANCE**

The undersigned hereby certifies that the foregoing document was prepared in accordance with N.D. Georgia Local Rule 5.1 and 7.1(D). Specifically, counsel certifies that she has used 14-point Times New Roman as the font in these documents.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served opposing counsel, with the foregoing pleading by e-filing the same with the Court's EM/CEF system and by depositing a true and correct copy of the same in the United States Mail with adequate postage affixed thereon, and addressed as follows:

Tyler H. Bridgers, Esq.  
The Simon Law Firm, P.C.  
2860 Piedmont Road N.E., Suite 210  
Atlanta, Georgia 30305

LaShawn Terry, Esq.  
Law Office of Nancy W. Phillips  
3200 Windy Hill Road SE, Suite 925E  
Atlanta, Georgia 30339-8554

This 21<sup>st</sup> day of March, 2019.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

KEVIN T. SHIRES

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